

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA

In re: Target Corporation Customer Data
Security Breach Litigation

This Document Relates to:
All Consumer Cases

MDL No. 14-2522

**DECLARATION OF SHANNON R.
WHEATMAN, PH.D. ON PARTIAL
COSTS OF THE NOTICE PLAN**

I, Shannon R. Wheatman, being duly sworn, hereby declare as follows:

1. I am president of Kinsella Media, LLC (“KM”), an advertising and notification consulting firm in Washington, D.C. specializing in the design and implementation of class action and bankruptcy notification programs. My business address is 2001 Pennsylvania Avenue NW, Suite 300, Washington, D.C. 20006. My telephone number is (202) 686-4111.

2. I submit this declaration at the request of Plaintiffs’ Counsel in connection with the class action notice program in the above referenced matter, *In re Target Corporation Customer Data Security Breach Litigation*.

3. On March 19, 2015, the Court approved the proposed Notice Program. This declaration will describe the cost of the media elements of the Notice Program.

MEDIA PLAN COST

4. The total cost associated with the paid and earned media portions of the Notice Program is \$470,162.71. Kinsella Media has been paid this amount. This cost includes published advertisements in *Better Homes & Gardens* and *People*; Internet advertising on *Facebook.com*, *Specific Media*, and *Advertising.com*; and a national press release issued on PR

Newswire. This amount does not reflect the costs associated with email and postage and mailing of the direct mail notice or the other administration components. Costs associated with that aspect of the program are outlined in the Declaration of Amy L. Lake On Partial Costs Of The Notice Plan.

I declare under penalty of perjury that the foregoing is true and correct. Executed in Washington, D.C. this 8th day of July 2015.

A handwritten signature in dark ink, appearing to read "Shannon R. Wheatman", followed by a long, sweeping horizontal line that extends to the right.

Shannon R. Wheatman, Ph. D